

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,)	Chapter 11
)	Judge Randal S. Mashburn
Debtor.)	

**JOINT MOTION FOR ENTRY OF AGREED ORDER CONTINUING PRELIMINARY
HEARING AND PREHEARING ORDER DEADLINES ON MOTION FOR RELIEF
FROM AUTOMATIC STAY FILED BY CIGNA HEALTHCARE OF TENNESSEE, INC
AND CONNECTICUT GENERAL LIFE INSURANCE COMPANY**

Capstone Pediatrics, PLLC ("Debtor"), and Cigna HealthCare of Tennessee, Inc. ("Cigna Tennessee") and Connecticut General Life Insurance Company ("CGLIC" and jointly with Cigna Tennessee "Cigna"), submit this joint motion for entry of an agreed order continuing the Notice of Preliminary Hearing and Prehearing Order deadlines entered by the Court on September 11, 2019 (Doc No. 143). In support, the parties state as follows:

1. Counsel for Cigna filed its Motion for Relief from the Automatic Stay as Necessary to Permit Termination of Certain Managed Care Agreements on September 6, 2019 (Doc. No 141).
2. Debtor's deadline to respond to the motion is September 17, 2019 ("Response Deadline").
3. Parties are ordered to file a Prehearing Statement no later than 4:00 p.m. on the 3rd business day before the Preliminary Hearing.
4. The Preliminary Hearing is currently set for September 24, 2019, at 8:30 a.m., in Courtroom 1, 2nd Floor, Customs House, 701 Broadway, Nashville, Tennessee 37203.
5. The parties are in discussions regarding the issues raised in the Motion and agree that a short continuance will be beneficial to the parties.
6. Accordingly, the parties hereby agree to continue the Debtor's Responsive Deadline 14 days to October 1, 2019, and to continue the Preliminary Hearing two (2) weeks from

September 25, 2019 to Tuesday, October 8, 2019. All other deadlines set forth in the Court's Prehearing Order are continued accordingly.

7. This Motion is filed in good faith and not for the purposes of delay.

WHEREFORE, the Parties move this Court for entry of an Agreed Order Continuing the Preliminary Hearing and Prehearing Order with related deadlines as requested herein.

September 16, 2019.

/s/ David W. Houston, IV
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*Counsel for Cigna HealthCare of Tennessee, Inc.
and Connecticut General Life Insurance Company*

CERTIFICATE OF SERVICE

On September 16, 2019, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ David W. Houston, IV
David W. Houston, IV (020802)